

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

| | | |
|----------------------------|---|------------------------------|
| CRAIG CUNNINGHAM, |) | CASE NO. 22-CV-00363-OLG-HJB |
| Plaintiff, |) | |
| vs. |) | |
| |) | |
| WATTS GUERRA, LLP, et al., |) | |
| Defendants. |) | (JURY DEMANDED) |

**DECLARATION OF NATALIE F. WILSON IN SUPPORT OF DEFENDANTS BERKEN
MEDIA, LLC’S AND ROBERT KENYON’S OPPOSITION TO PLAINTIFF’S MOTION
TO COMPEL DISCOVERY AND FOR SANCTIONS**

Natalie F. Wilson, under penalty of perjury, declares and states as follows:


1. I am over 18 years of age and competent to make this Declaration.
2. I am a shareholder of the law firm of Langley & Banack, Incorporated in San Antonio, Texas, and from February 2023 to July 2023, I was counsel of record for Berken Media, LLC and Robert Kenyon (together, the “Berken Defendants”) in the above-captioned litigation.
3. In late April 2023, I conferred with Plaintiff via telephone regarding various discovery matters. During that call, Plaintiff made reference to written discovery requests that were allegedly served “months” previously, even before the Berken Defendants had appeared in the case.
4. I sought clarification from Plaintiff if he was referring to the discovery requests that had been placed on the docket in December 2022 and informed him that those discovery requests were not effective under the applicable rules. Nevertheless, I sought to reach a consensus on a response deadline if those were the discovery requests to which Plaintiff sought responses from the Berken Defendants.

5. Plaintiff also made reference to discovery requests that had been served directly on one or both of the Berken Defendants before their appearance in the case; I remain unclear whether those were the same requests as those put on the docket in December 2022. I informed him that I was unaware of any such discovery requests and reiterated the position that such requests were not properly served under the applicable rules. I asked Plaintiff to re-send me the discovery responses he asserted had been served on the Berken Defendants prior to my involvement in the case so that we could confer about an appropriate response deadline that would permit discovery (including depositions) to proceed in an orderly and timely manner pursuant to the applicable Rules and this Court's scheduling order. Plaintiff did not serve any written discovery requests on me despite my request and my stated willingness to respond to written discovery in a timely and appropriate manner.

6. I have never conspired with Ms. O'Neil or any lawyer or party in this case to delay or avoid participating fully in the discovery process as required under the applicable rules and orders governing this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed this 21st day of July, 2023 in San Antonio, Texas.

By: 

Natalie F. Wilson